

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66

JANE ROE,)
)
Plaintiff,)
)
v.)
)
UNITED STATES OF AMERICA, et al.,)
)
Defendants.)

DEFENDANTS' JOINT MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEFS

On behalf of Defendants United States of America, Judicial Conference of the United States, Administrative Office of the United States Courts, United States Court of Appeals for the Fourth Circuit, Judicial Council of the Fourth Circuit, Federal Public Defenders' Office, Roslynn R. Mauskopf, Chief Judge of the United States District Court for the Eastern District of New York, and Chair of the Judicial Conference Committee on Judicial Resources, and James C. Duff, Director of the Administrative Office of the United States Courts, in their official capacities, General Counsel Sheryl L. Walter, Chief Judge Roger L. Gregory, United States Court of Appeals for Fourth Circuit, Circuit Executive James N. Ishida, United States Court of Appeals for Fourth Circuit, and Federal Public Defender Anthony Martinez, Western District of North Carolina, in their individual and official

capacities, (collectively, “Defendants”), the undersigned counsel hereby move the Court for an extension of time of seven days to file their reply briefs in support of Defendants’ motions to dismiss, to and including July 17, 2020. In support of this Motion, the following is provided:

1. In response to Defendants’ motions to dismiss, Plaintiff sought and the Court granted, with the consent of Defendants, Plaintiff an eleven-day extension as to some Defendants and a fourteen-day extension as to other Defendants, to respond to Defendants’ motions.

2. On July 3, 2020, Plaintiff filed her oppositions to Defendants’ motions to dismiss.

3. Under Local Rule 7.1(e), Defendants have seven days to file their reply briefs.

4. Counsel for Defendants need additional time to respond to the various arguments addressed in Plaintiff’s oppositions, to coordinate their reply briefs with numerous defendants (including multiple individual-capacity defendants), and clear three DOJ branches prior to filing. Specifically, the Plaintiff sued eleven defendants, including Chief Judge Roger L. Gregory of the United States Court of Appeals for the Fourth Circuit, Chief Judge Roslynn R. Mauskopf of the United States District Court for the Eastern District of New York and Chair of the Judicial Conference Committee on Judicial Resources, Circuit Executive James N. Ishida of the United

States Court of Appeals for the Fourth Circuit, James C. Duff, Director of the Administrative Office of United States Courts, Sheryl L. Walter, General Counsel for the Administrative Office of United States Courts, and Anthony Martinez, Federal Public Defender for the Western District of North Carolina, and drafting, circulating, and finalizing the reply briefs will require their input and concurrence. Additionally, the reply briefs (except for the Federal Public Defender) will require review by Constitutional and Specialized Torts Branch, Federal Programs Branch, and the Appellate Division of the United States Department of Justice.

5. Additional time is needed in light of the global COVID-19 pandemic, which will likely complicate the review process.

6. For all of these reasons, the undersigned hereby move the Court for a seven-day extension of time to file their reply briefs until and including July 17, 2020.

7. Pursuant to Local Civil Rule 7.1(b)(2), the undersigned have consulted with Plaintiff's Counsel. Plaintiff's Counsel consents to the extension of time.

WHEREFORE the undersigned hereby move the Court for an extension of time for Defendants to file their reply briefs from July 10, 2020 until and including July 17, 2020.

This the 6th day of July, 2020.

Respectfully submitted,

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